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January 3, 2020

**BY ECF**

Honorable Steven Tiscione  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Surriel v. PANYNJ*, 19 CV 3867 (PKC) (ST)

Your Honor:

I represent plaintiff in the above-referenced action. I write with defendants' consent to respectfully request a 30-day extension of plaintiff's deadline to file a motion to amend the complaint.

By minute entry dated October 21, 2019, the Court set today as the deadline to file motions for leave to amend the complaint. However, plaintiff awaits defendants' discovery responses, which the undersigned would like to review before preparing a proposed amended pleading. Defendants indicate that the responses should be received within the next two weeks. Accordingly, plaintiff respectfully requests adjournment of the deadline for motions for leave to amend, from today until February 3, 2020.

No previous requests to adjourn this deadline have been submitted and the proposed adjournment will not affect any other scheduled deadlines.

Thank you for your consideration of this request.

Respectfully submitted,

  
Gabriel P. Harvis

cc: All Counsel

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